

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Joint Administration Requested)

Re: D.I. 335 & 336

**NOTICE OF FILING OF UNREDACTED (A) PRELIMINARY OMNIBUS
OBJECTION OF THE AD HOC TERM LOAN GROUP TO THE
DEBTORS' (I) BIDDING PROCEDURES MOTION AND (II) CASH
COLLATERAL MOTION AND (B) DECLARATION OF ANDREW K.
GLENN IN SUPPORT OF THE PRELIMINARY OBJECTION**

PLEASE TAKE NOTICE that on February 6, 2025, the Ad Hoc Term Loan Group² filed under seal (a) the *Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion* (D.I. 299) ("Preliminary Objection") and (b) the *Declaration of Andrew K. Glenn in Support of the Preliminary Omnibus Objection of the Ad Hoc Term Loan Group to the Debtors' (I) Bidding Procedures Motion and (II) Cash Collateral Motion* (D.I. 300) (the "Declaration").

PLEASE TAKE FURTHER NOTICE that, after conferring with the Debtors pursuant to Del. Bankr. L.R. 9018-1(d)(ii), the Ad Hoc Term Loan Group is advised that the Preliminary Objection and Declaration may be filed publicly without redaction.

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings I, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, OH 44236.

² The members of which are lenders under the Debtors' prepetition Credit Agreement, dated as of April 30, 2024 (as amended, restated, supplemented, or otherwise modified, the "Term Loan Credit Agreement," the loans issued thereunder the "Term Loan," and lenders thereunder the "Term Lenders"), and are set forth in the *Verified Statement of the Ad Hoc Term Loan Group Pursuant to Bankruptcy Rule 2019* (D.I. 54).

PLEASE TAKE FURTHER NOTICE that the unredacted version of the Preliminary Objection appears at D.I. 335.

PLEASE TAKE FURTHER NOTICE that the unredacted version of the Declaration appears at D.I. 336.

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Dated: February 7, 2025
Wilmington, Delaware

Respectfully submitted,

/s/ Matthew B. Harvey

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